

1 MICHAEL C. MILLS, ESQ.
2 Nevada Bar No. 003534
3 Bauman Loewe Witt & Maxwell, PLLC.
4 3650 N. Rancho Drive, Suite 114
5 Las Vegas, NV 89130
6 Phone: 702-240-6060
7 Fax: 702-240-4267
8 Email: mmills@blwmlawfirm.com

9 TAMRA FERGUSON, ESQ.
10 (Pro Hac Vice)
11 Tamra Ferguson
12 1655 N. Fort Myer Dr., Suite 700
13 Arlington, VA
14 Phone: 703-679-8903
15 Email: tferguson@tfergusonlaw.com

16 Attorneys for International Institute of Management, LLC

17 **IN THE UNITED STATES DISTRICT COURT FOR THE**
18 **DISTRICT OF NEVADA**

19 INTERNATIONAL INSTITUTE OF
20 MANAGEMENT,

Case No.: 2:18-cv-01748-JCM-GWF

21 Plaintiff,

22 vs.

23 ORGANIZATION FOR ECONOMIC CO-
24 OPERATION AND DEVELOPMENT
25 (OECD),

26 AND

27 PROFESSOR JOSEPH STIGLITZ

28 AND

JOHN DOE

Defendants

STIPULATION FOR EXTENSION TO RESPOND TO MOTION TO DISMISS BY
ORGANIZATION FOR ECONOMIC CO-OPERATION AND DEVELOPMENT (OECD)
[ECF NO. 21]

(First Request)

Plaintiff, International Institute of Management and Defendant's Organization for
Economic Cooperation and Development (OECD) and Professor Joseph Stiglitz, by and
through their undersigned counsel (collectively the "Parties"), for good cause shown,

1 hereby stipulate and agree to extend Plaintiff's deadline to respond to Defendant's
2 Motion to Dismiss the Complaint [ECF No. 21] from February 5, 2019 to February 26,
3 2019; and Defendant's deadline to submit its Reply to Plaintiff's Response to
4 Defendant's Motion to Dismiss the Complaint to be extended to March 12, 2019. This is
5 the Parties' first extension request.

6 Dated this 31 day of January 2019

Dated this 31 day of January 2019

7 GIBSON DUNN & CRUTCHER LLP

BAUMAN LOEWE WITT & MAXWELL

8 /s/ Joseph Tartakovsky

/s/ Michael C. Mills

9 JOSEPH TARTAKOVSKY, ESQ.
Nevada Bar No. 13796
10 555 Mission Street, Suite 3000
San Francisco, CA 94105-0921
11 Phone: 415-393-8388
Email: jtartakovsky@gibsondunn.com
12 Attorney for Organisation for Economic
Co-operation and Development

MICHAEL C. MILLS, ESQ.
Nevada Bar No. 003534
3650 N. Rancho Dr., Ste. 114
Las Vegas, NV 89130
Phone: (702) 240-6060
Fax: (702) 240-4267
Email: mmills@blwmlawfirm.com

13 TODD E. KENNEDY, ESQ.
Nevada Bar No. 006014
14 KENNEDY & COUVILLIER
3271 E. Warm Springs Rd.
15 Las Vegas, NV 89120
Phone: 702-608-7931
Email: tkennedy@kclawnv.com
16 Attorney designated for service for
Joseph Tartakovsky pursuant to Local
17 Rule 1A 11-1(b)

TAMRA FERGUSON, ESQ.
(Pro Hac Vice)
Tamra Ferguson
1655 N. Fort Myer Dr., Suite 700
Arlington, VA
Phone: 703-679-8903
Email: tferguson@tfergusonlegal.com
International Institute of Management,
LLC

18
19 **IT IS SO ORDERED**

20
21 
22 _____
UNITED STATES DISTRICT COURT JUDGE,

23
24 DATED: 2/04/2019
25
26
27
28